

CSReeder, PC
TRIAL LAWYERS AND GENERAL COUNSEL

February 27, 2023

The Honorable Louis L. Stanton
United States Judge
Southern District of New York
Daniel Patrick Moynihan
U.S. Courthouse
500 Pearl Street
NY, NY 10007-1312

Dear Judge Stanton:

Re: *Lynne Freeman v. Tracy Deebs-Elkenaney et. al.*, Case No. 22 Civ 2435 (LLS) (SN)

We are attorneys for Lynne Freeman and are writing to you on our behalf.

On February 8, 2023, Defendants filed Three exhibits under seal, Exhibits, “B,” “C” and “D” under seal (ECF 122). All three exhibits were stamped confidential pursuant to the Protective Order entered in the case.

Plaintiff hereby makes motion seeking that Exhibits “B” and “C” remain sealed. Exhibit “B” is a confidential unpublished version of a manuscript written by Plaintiff and Exhibit “C” is related confidential notes. Plaintiff is concerned that if they are not sealed that someone could copy them. We are making this motion pursuant to ECF 125.

Thank you for your consideration of this matter.

Respectfully submitted,

CSReeder, PC



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cc: All counsel of record (via ECF)

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